

## REMARKS

Claims 1-38 are pending in the application and stand rejected. Claims 1-25 and 27-38 stand rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,501,832 to Saylor et al. In addition, claim 1 stands rejected under 35 U.S.C. 102(e) as being unpatentable over U.S. Patent No. 6,430,624 to Jamtgaard.

Applicants respectfully submit that at the very least, Saylor does not anticipate the inventions of claims 1, 23 or 34. For instance, with regard to claims 1 and 23, Saylor does not disclose *a conversational portal comprising a conversational browser which provides a conversational user interface to enable access to the conversational portal across a plurality of different modalities including an audio modality and a non-audio modality*, as essentially claimed.

In the Response to Arguments section of the Final Office Action, Examiner relies on various portions of Saylor, which disclose converting voice content of a voice page Vpage to text (via speech-to-text). However, Examiner ignores that Saylor explicitly discloses a voice-based system for accessing voice pages in a VNAP (voice network access provider) system, which includes a **voice browser** that is capable of processing audio input from a user. No matter how much Examiner attempts to mischaracterize Saylor, Saylor does not disclose or suggest *a conversational portal comprising a conversational browser* as contemplated by the invention. Saylor does *not* disclose or suggest *a conversational portal having a conversational browser which provides a conversational user interface to enable access to the conversational portal across a plurality of different modalities including audio and non-audio modalities*, as essentially claimed in claims 1 and 23. The voice-based system of Saylor enables user-

interaction for accessing content in audio only modality. Saylor does not disclose enabling a user to interact with the system for accessing content using a non-audio modality.

Furthermore, with respect to claim 34, for example, Saylor does not disclose the *conversational portal adapting an interaction dialog with the access device based on the at least one modality of the access device, wherein adapting the interaction dialog includes adapting the interaction dialog to an audio modality and a non-audio modality*, as essentially claimed in claim 34. Again, the portal disclosed in Saylor is limited to an audio modality, and the portal does not include a mechanism for adapting interaction dialog in other modalities. Saylor does not disclose means for enabling a user to interact with the voice-based system to access content using a non-audio modality (or non-audio –based user interface).

Moreover, with respect to claim 1, the Examiner's rejection of claim 1 based on Jamtgaard appears to erroneous because Examiner's rejection does not directly address the elements of claim 1. Thus, Examiner's rejection is confusing and should be clarified.

In any event, Jamtgaard does not disclose *a conversational portal, comprising a conversational browser which provides a conversational user interface to enable access to the conversational portal across a plurality of different modalities including an audio modality and a non-audio modality ...*, as recited in claim 1. In response to Examiner's Response to Arguments, it is submitted that the Examiner has misinterpreted and mischaracterized Applicants' arguments with respect to Jamtgaard. Again, Jamtgaard discloses a content delivery system wherein a user directly and independently accesses a web site (not via a portal) and wherein the web site accesses a translation server (12) only if the requesting device is not compatible with the format of the content pages supported by the accessed web site (see, e.g.,

Col. 7, lines 12-30). The translation server (12) acts as a proxy server for an Internet content provider to translate content pages if needed, but the translation server (12) clearly does not function as a portal site. There is nothing in Jamtgaard that remotely discloses or suggests a conversational portal that *comprises a conversational browser which provides a conversational user interface to enable access to the conversational portal across a plurality of different modalities including an audio modality and a non-audio modality ...* as recited in claim 1.

Examiner's characterization of the portal proxy/capture module (20), conversational proxy server (27) and transcoder (28) is not only misplaced, but irrelevant with respect to claim 1. Even if the translation server (12) of Jamtgaard may be construed as a transcoder (28), the Examiner still has not shown how Jamtgaard discloses a conversational browser as contemplated by the invention.

Therefore, for at least the above reasons, claims 1, 23 and 34 are patentable and non-obvious over Saylor and Jamtgaard. Furthermore, all pending claims that depend from claims 1, 23 and 34 are believed to be patentable over the cited combination at least by virtue of their dependence from respective base claims 1, 23 and 34.

Accordingly, withdrawal of the claim rejections is requested.

Respectfully submitted,



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